

## **Exhibit M**

**Lauren Schmittau**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF**  
**LAUREN SCHMITTAU**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF RICHMOND   )

LAUREN SCHMITTAU, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 479 Elverton Avenue, Staten Island, NY 10308.

2. I am currently 30 years old, having been born on June 27, 1991.

3. I am the daughter of John Schmittau, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on November 28, 2012, when I was 21-years old. It has been medically determined that his illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad and I were very close. We would always have heart-to-heart talks. He molded me into who I am today. He was a profound and sensitive person. He taught me what it meant to accept your emotions. He told me it was okay to feel negative emotions, as long as you have a family that loves you. He taught me an adult's point of view as a child. He made me more mature for my age. There's a lot about my upbringing that was different for me than for my younger sisters. My dad did his best to make sure my sisters and I always got along. We

would play softball together every Sunday. We had fun and played video games together. My father was a hard-working man. He had a wife and three young daughters to support. He was my whole heart.

6. I was just a kid at the time of 9/11. I knew that he was a supervisor for the NYC Department of Sanitation. He was a manager and was under a lot of stress. He was young to be in a managerial role. He had a lot of responsibilities, more than the average person his age. I knew that he worked at the World Trade Center site and at the Staten Island landfill.

7. I wasn't sure at first about his illness. I thought he just had pancreatitis, diverticulitis, or digestive issues. I knew that he had stress from work, so I attributed it to that. In reality, my father had been diagnosed with pancreatic cancer. The cancer destroyed his body, and the medications and treatments weakened his health further. As a result of these treatments, he suffered from comorbid diseases such as diabetes. When my dad got sick, I buried myself with work to cope. One day, I overslept and missed his morning medications. He was so mad at me, and I didn't understand why. He said he could die if he missed his medications, and that missing them could have severe consequences. I started to realize how serious his illness was. I felt extremely guilty for being so ignorant and selfish.

8. At the time my dad was diagnosed with cancer, I was a full-time college student and was also a manager at a retail store. I worked 12-hour days and developed unhealthy habits that consumed me. I didn't go home, wasn't there for my family, and wasn't there for myself. I did whatever I could to not be present. I wanted it to not be happening. I dropped out of school, became pregnant and developed an addiction. I made all the wrong choices. I can't blame anyone but myself. I didn't even know what everyone else in my family was going through at the time, because I didn't care. Even after he passed, I was still in denial.

9. I felt so much guilt. I can never go back and change my actions. Instead of taking pain away from my family members during my dad's illness, I added to the pain. That was extremely selfish. I wish I could go back and be the person that he deserved, a good sister and a good daughter. I can never apologize to him. I'm getting married in October of this year, and he won't be there to walk me down the aisle. I just bought my first house. My dad was a real estate agent, and he would have loved to see me buy my first house, but he didn't get to see that. He is missing a huge part of my life. I do my best to push it down and accept my wrongdoings.



10. It's a travesty that these families have to experience this kind of pain. Some people get sick, others die of natural causes. But to have it done upon you by a terrorist, and to take so much from others, we didn't ask for this. My father wasn't even middle aged when he died. He was only 45-years old. I'm now the same age he was when he had kids. It's so sad. And we're not the only family that has to deal with this type of heartache. My heart goes out to everybody – the people who died that day, the people who died of illnesses later on, and the people who are still developing illnesses. What happened on 9/11 was a pure act of hatred from one country to another. The amount of suffering can't even be measured.

  
LAUREN SCHMITTAU

Sworn to before me this  
21 day of June, 2022

  
Notary Public



**Victoria Schmittau**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
VICTORIA SCHMITTAU**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF RICHMOND    )

VICTORIA SCHMITTAU, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 29 Truman Street, Staten Island, NY 10307.

2. I am currently 24-years old, having been born on June 1, 1997.

3. I am the daughter of John Schmittau, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on November 28, 2012, when I was 15-years old. It has been medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was very involved in my life. My family used to joke that I was “all dad on the inside, all my mom on the outside,” because of how much I looked like my mom but acted like my dad. My dad always helped me with school and homework. He was my softball coach. He actually coached the older girls’ team, and I always played up so that he could be my coach, too. He went to all my cheerleading competitions and gymnastics meets. We constantly played videogames together and loved to draw and paint. We would spend time together

whenever he wasn't working. He was my biggest supporter. He was an integral part of my life, and he was always around.

6. I was only 4-years old when 9/11 happened. I didn't even understand what 9/11 was. I didn't know what a terrorist was at the time. As I got older, my dad was at work a lot more. I learned more about his work for the NYC Department of Sanitation and how he worked at the World Trade Center site doing clean-up.

7. I was 13-years old when my dad was diagnosed with pancreatic cancer, and 15-years old when he died. I have repressed a majority of my life during that time. I don't remember being sat down and told that "Dad has cancer." I found out he had cancer when Kayla and I were arguing and my dad got involved. I was talking back to my dad, and my sister Kayla said to me, "How are you going to talk like that to him when he has cancer and a year to live?" I remember him looking at me in sheer horror after hearing that. Before that point, I thought he just had pancreatitis and an inflamed pancreas. The word cancer was barely even in my vocabulary. I didn't know anyone who had cancer or anyone who had lost a parent. I only realized how serious it was when my friends' parents started asking me in concerned voices how my dad was doing. My whole life did a 180. I watched his friends carry him in to our house from the car like a helpless child because his body was so weak from chemotherapy. He was in the hospital all the time.


8. My parents did a phenomenal job of keeping us from more trauma than they knew we could endure. My mom lost her dad when she was young, so she didn't want us to go through the painful details like she did. I kept busy with high school and played three sports. When my dad started getting more and more sick, that's when it began to really impact me. I had to take on more adult responsibilities even though I was only 14-years old. I was juggling between being in a Scholars program in my high school and studying for the SAT exam. I started to realize how much pain my dad was in when I could hear him groaning from the pain. He was destroyed when he had to miss my championship softball game because he was too sick to make it.

9. I lost out on so much with my dad. He never got to see me turn Sweet Sixteen, and he'll never walk me down the aisle at my future wedding, or get to meet my future children. You don't know who you're going to turn out to be at age 15. If my dad were alive to see me

now, I am nothing like I was back when he was alive. I lost out on everything. He never even saw me get to go to college. So, I feel cheated that I didn't get to celebrate any major life milestones with my father.

10. My dad lived for his children. I've never seen any other father more involved in his kids' lives. He would do anything for us. He worked three jobs so that we could live the life he wanted us to live and so that my mom could stay home with us. My dad gave up his last chemotherapy and radiation treatments to be fully present on our last family vacation. He went from being the strongest person I knew, to a withered, deteriorated version of himself. I didn't even recognize him on the day that he died. When he passed away in the hospital, my grandmother pulled his gown off. I've never seen someone's body so frail. I could see his ribs, collarbone, and sternum. He was like a skeleton. That image will forever be burned in my mind. I work in medicine now, and I work with cancer patients. I still have never seen anything like that. And I pray to God that I never have to see that again. It's traumatizing, and I hope my future children never have to see anything like that. I don't know how my mom lives her life every day having seen that. When it comes to something like this, that other families have to go through, it is truly traumatizing. My experience with my father's illness has made me reconsider everything. I question so much about my life's future path. It scares me to think about getting married and having kids. I would never want to have anyone I love experience what my family has had to endure through my dad's illness and the life we have lived without him in it.

  
VICTORIA SCHMITTAU

Sworn to before me this  
 day of April, 2022

  
Notary Public

**ROBERT GROVA**  
Notary Public - State of New York  
No. 01GR6359771  
Qualified in Richmond County  
My Commission Expires June 5, 2025

**Barbara Scoblic**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
BARBARA SCOBLC**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF NEW YORK    )

BARBARA SCOBLC, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 360 East 72<sup>nd</sup> Street, Apartment A1105, New York, NY 10021.

2. I am currently 82 years old, having been born on July 21, 1939.

3. I am the wife of Joseph M. Scoblic, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from renal cancer and lymphoma on June 16, 2014. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My husband and I had a good relationship. We had a strong family bond and raised two sons together. We used to go to museums, go out to dinner in New York City, or just relax at home. He was a healthy man. He exercised every day, ate healthy, and never smoked or drank.

6. Joseph worked for Citibank on 9/11. He was commuting to his office that morning at 388 Greenwich Street. He was walking towards his office when he saw the second



plane hit the World Trade Center. Fortunately, he was able to turn around and come home despite the chaos in the city that day. However, as soon as they let him go back, he immediately returned to work. He was a hard worker, and worked 10-12-hour days for his entire career. He rarely missed a day of work in his 38 years of working. On the river, right outside his office, was the barge where they loaded all the debris from the World Trade Center. The barge was located right next to the air intake system for the entire Citibank building. So, he was there, breathing in all the toxic air in the office every single day that he worked.

7. Joseph became immediately and noticeably ill after 9/11. In the year following, we probably visited the hospital four or five times. He was diagnosed non-stop with different illnesses. He had blood clots. He was diagnosed with a prostate tumor, a kidney tumor and had lymphoma. He started to show signs of physical decline. He had less energy, had trouble walking, and started to experience memory issues. His physical abilities went from completely normal to noticeably impaired.

8. I dropped everything to become his full-time caretaker. Because of continual hours-long visits to medical doctors and specialists in attempt to treat his three cancers, I had to give up my writing career. I was part of a two-year competitive writing program and attended weekly writing classes, but I could no longer pursue them as I became Joseph's caretaker. I was there for every medical test, x-ray, CT scan and PET scan. It was hard for me to leave behind my regular writing workshops, as they were a source of social support for me. I could no longer meet with friends due to caring for my husband, or because I was simply too exhausted. As I witnessed Joseph's condition decline, I began to suffer from serious depression. My appetite diminished, I lost twelve pounds in six months, and I was constantly tired. A psychiatrist diagnosed me as being situationally depressed. My sleep was disrupted every night by his tossing and turning. He even began yelling out in his sleep, so I started to sleep on the living room couch. But with his increasing lack of stability, I was worried he'd try to get out of bed and fall. So, I returned to the same bed but got no sleep.

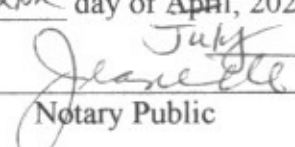
9. It was difficult to take care of Joseph, both mentally and physically. It wasn't safe for him to be alone, so I had to monitor him all the time. He was often at risk of falling. I tore my rotator cuff and sprained my neck under the stress of helping him up after one fall. He didn't understand that he needed physical assistance, which led to several calls to 9-1-1, and long days

and nights in the emergency room. Joseph also had undiagnosed Lewy body dementia, which affects chemicals in the brain and causes increased paranoia and can lead to problems with thinking, movement, behavior and mood. Joseph developed Obsessive-Compulsive Disorder and the symptoms soon became unmanageable. His attitude towards me changed as a result. He became verbally abusive and manipulative. As his OCD worsened, he would fabricate stories that I was neglecting him and being unfaithful. He was extremely intelligent, and these stories were often believable. This led to fractures in my relationship with him and with my sons. My sons and I made the decision to place him in a long-term care facility. He blamed me for that decision and became increasingly angry and resentful. It was awful. His care just got to be beyond my capabilities.

10. Joseph's illness was extremely stressful and placed a huge burden on our family. I tried my hardest to take care of him, but it was difficult due to his mental and physical decline. He had a horrible end to his life, and by the time of his death, our family relationship was nearly destroyed. Our relationship as husband and wife had completely deteriorated. It took five years after his death before I gained a sense of perspective and could begin to move forward in my life. My husband and my family suffered, and we didn't deserve that. No family does.

  
BARBARA SCOBLIC

Sworn to before me this  
26th day of ~~April~~, 2022

  
Notary Public

JEANETTE RODRIGUEZ  
Notary Public - State of New York  
No. 01RO6261299  
Qualified in New York County  
My Commission Expires May 14, 2024

**Stephen Scoblic**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
STEPHEN SCOBLIC**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF COLUMBIA )

STEPHEN SCOBLIC, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 82 Nettleton Lane, Chatham, NY 12037.

2. I am currently 44 years old, having been born on September 20, 1977.

3. I am the son of Joseph M. Scoblic, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from kidney cancer and lymphoma on June 16, 2014. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I had a close relationship. We would go together to museums and for dinners in the city as a family. He would come visit me in the countryside, where I now live, and we would chainsaw down trees in the woods together. He would help me with repairing my house. We had a close family relationship. He was a truly devoted father to my brother and me, and a wonderful husband to my mother. He was religiously devoted, and always made sure that my brother and I were serious about our education.



6. My father worked at Citibank, located at 388 Greenwich Street, on 9/11. He was walking towards his office that morning when the second plane hit the World Trade Center. He was able to escape the downtown chaos and make it back home, but he went right back to work as soon as he could. He worked for Citibank for about two to three years after 9/11. He never missed a day of work. That was true for his entire career. He worked 10- to 12-hour days, 5 days per week, for 38 years. Right outside his office was the barge where they loaded the debris from the World Trade Center. Next to the barge was the air intake system for the Citibank building, so that was bringing in all the toxins from the barge. He was breathing all of that in for days, weeks, and months on end.

7. For about a year after 9/11, it seemed like my father was in the hospital all the time. He had about 4 or 5 hospital stays per year. He was getting diagnosed non-stop with different illnesses. He was diagnosed with blood clots, a prostate tumor, a kidney tumor and lymphoma. It just didn't stop. Before 9/11, he was an extremely healthy man. He exercised every day, ate a healthy diet, and he never smoked or drank. I saw his energy levels go down right away after 9/11. He later started to develop issues with walking. His normal stride turned into a shuffle. This was hard to believe from a man who used to chainsaw down trees in the woods. His memory started to fade as well, and he wasn't as sharp as he had been.

8. I became my father's primary caretaker, alongside my mother. He couldn't do many of the things we had done before. It was a big deal to even go to a museum. Just getting him in and out of the car was a struggle. His illness depressed him, and his personality changed. This was all over a span of several years. I felt frustrated for him, and saddened to see his condition deteriorate. He had worked so hard for so long, and he was about to retire. It felt like he got cheated out of his retirement, and I got cheated out of spending more time with him. His illness placed a stressful burden on my mother and me. He started to make unsound decisions. He was a penny pincher his whole life, but all of a sudden, he took out two mortgages on our house. It was a huge weight on our family and caused many fights.

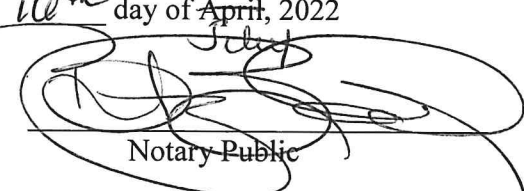
9. I took care of my father full-time for about two years. I stopped working and picked up odd jobs to support him. He couldn't really do anything anymore. I bought his groceries, took him to the hospital, fed him, gave him his medicine, and made sure he didn't fall in the house. It wasn't safe for him to be alone. I made the commitment of time and mental

energy to take care of my father. My mother went above and beyond for taking care of my father as well. It destroyed her life. She saw things behind the scenes with my father that my brother and I didn't see. She had been accepted to a competitive two-year writing program, which she had to drop out of so she could take care of my father. She became depressed as well, and had to stop seeing friends so that she could watch my father full-time. My father's attitude towards her changed, and he started blaming her for things that hadn't happened. It was so hard to watch.

10. My father had a terrible end to a great life. My dad had more integrity than anyone I've ever met. He was honest and truthful. He sacrificed so much for my brother and me. He worked hard to put us through private school. My father came from nothing, and he gave his wife and children a good life. His life was cut short. When he became ill, it didn't make sense how this could happen to such a good person. At the time, I was just trying to help him survive—to get through the next surgery, the next chemotherapy treatment. None of us gained perspective on the situation until years after he passed. He was just a normal, healthy guy. He experienced an onslaught of terrible diseases that altered his entire being. I saw my parents' relationship deteriorate, and our family relationship was damaged. It still is to this day. This was a terrible way to lose my dad. It was just a horrible experience.

  
STEPHEN SCOBLIC

Sworn to before me this  
11th day of April, 2022

  
Notary Public

BETSY M. BRALEY  
No. 01BR6071036  
Notary Public, State of New York  
Qualified in Columbia County  
My Commission Expires Jan. 6, 2023

**Gebraela Sheldon**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF**  
**GEBRAELA SHELDON**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA        )  
                              : SS.:  
COUNTY OF SEMINOLE    )

GEBRAELA SHELDON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2408 Willow Drop Way, Oviedo, FL 32266.

2. I am currently 39 years old, having been born on January 30, 1983.

3. I am the wife of William Sheldon, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from colon cancer on March 2, 2015, at the age of 47. It was determined by the World Trade Center Health Program that this cancer is causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attack.

5. My husband was fully healthy before he was diagnosed with colon cancer. We lived a normal, active life. We went on vacations together and did lots of activities with our two children, Anna and John. We had a wonderful relationship. He was a loving, wonderful husband and a great father. He was an all-around great man.

6. On 9/11, Bill was working downtown by the World Trade Center. He was right there when the first and second tower fell. He saw people falling out of the towers. Bill was an agent for the Bureau of Alcohol, Tobacco, and Firearms. He worked for three weeks at the Staten Island landfill, digging through all the rubble and finding bodies. He was trying to find survivors but there were none. It was very sad for him, finding bodies and body parts. He told me of the times that he found hands, arms, and legs. It was exhausting for him, both mentally and physically. He was working many hours of overtime, sometimes working overnight. He was emotionally drained from what he had seen with his own eyes.

7. He was diagnosed with colon cancer in January 2014. He was feeling tired, and he was not feeling like himself. He went to the World Trade Center Health Program to get checked out once a year. During his visit, he was complaining about pain in his right side. They gave him an x-ray, which revealed that he already had Stage IV colon cancer. By that time, it had spread to his liver.

8. It was horrible finding out about his illness. We had very young children, they were only aged four and six at the time of his diagnosis. I had to be there for him and the kids. Whenever I was taking care of Bill, I was nervous that I wasn't taking care of my kids enough. And vice versa. I lost twenty pounds just from the stress. It was a very, very difficult experience. Seeing him suffer was extremely difficult and watching him be in so much pain was just awful. It was the worst part. I always had to be in three places at once: watching my two kids or finding them a babysitter, watching my husband at home, or bringing my husband to the doctor or hospital. Every month, we would travel from Florida to New York City for Bill's treatment. His liver doctor was at Sloan Kettering Cancer Center. Between flying to New York, trying to book hotels, and getting someone to look after the kids, it was terrible. I never wanted to go through it. As a family, we went through hell.

9. I became Bill's "spokesperson." I made all his appointments, visited every doctor with him, and flew to every cancer treatment with him. He needed someone there with him. He was in so much pain. I hated seeing him by himself in the hospital. I saw other patients with nobody visiting them and it broke my heart. My life was extremely busy during that time. I would be home, trying to help my kids with homework and cook for them, but also taking my husband to the doctor, to the hospital, and picking up his prescriptions. When I wasn't home,

my brother helped look after my kids and took them to school. I felt the pain of both my kids and my husband. My kids were so young at the time, and I felt like I was neglecting them. I was so torn. My daughter doesn't even remember her father because he was in the hospital all the time. My son would ask me, "Why does Papa have to suffer like that?" It was an awful time in my life.

10. Bill went through chemotherapy and it caused him to vomit all the time. I didn't know what to do for him. I felt helpless. He had chemo every other week, so it took a huge toll on his body. I had to make sure he took his pain medications. He fought the cancer hard, but his quality of life was close to zero, and mine was just non-stop stress. We soon found out that his cancer had spread everywhere. I knew there was little hope that he would survive, and it wasn't long after that that he passed away. The thought of life without my husband and having to raise my two kids without their father scared me to death. And it broke my heart that they would never know how wonderful a man their father was. It's my job to keep his memory alive in them.

11. Bill fought the cancer hard. That's who he was. He was a good and honorable man. Knowing that he wouldn't be there for me or the kids killed him. Our children were so young, and I was a stay-at-home mom. It was hard to bear. He didn't deserve to suffer the way he did. No one does. And I didn't deserve to watch him fight such a hard battle. It was excruciating to watch what he went through. And my kids didn't deserve to lose their father at such a young age. I guess life is not always fair.

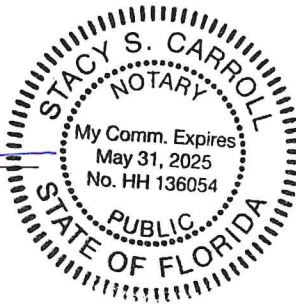
12. Bill joined the army after 9/11, at age 37. He knew that was an opportunity to serve his country. Now, my son sees his legacy and wants to join the army and serve his country too. My kids will never have a father, and I will never have a husband. My children lost their innocence at a very young age. They saw suffering. They didn't deserve to witness that. My husband will never be there to see our kids graduate or get married. Bill will never walk Anna down the aisle. He will never be there to see his grandchildren one day. My son just started to drive, his father should have been there to teach him. I remember seeing my son John cry and ask me, "Why does this have to happen to Papa?" Our life as a family was taken away from us.

All that we could have had was taken away from us, and it still hurts.

  
GEBRAELA SHELTON

Sworn to before me this  
8 day of April, 2022

  
Notary Public



## **Estate of Henry Bruce Byrd**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
SHEILA CRISS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF DUTCHESS    )

SHEILA CRISS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 67 Orchard Drive, Poughquag, NY 12570.

2. I am currently 65 years old, having been born on May 4, 1956.

3. I am the sister of Henry Bruce Byrd, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my brother's estate.

4. On April 12, 2014, my brother passed away from esophageal cancer at the age of 52. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On March 13, 2015, I was issued Letters of Administration on behalf of my brother's estate from the Circuit Court for Flagler County, Florida, Probate Division.

6. I had a close relationship with my little brother. We were raised by our mother and stepfather. I was his only sister. We would travel, go places together, go to parks together, go to Coney Island and go on the rides together. We had good times growing up. We loved to explore New York together. When we got older, we both moved to upstate New York. We

would see each other at least three times per week since we lived less than 30 minutes driving distance from each other. Henry had a good relationship with my children as well. We loved to talk about our family. We had a respectable relationship as siblings and never had strong words to say to each other. It was always laughter and a good time.

7. I know that Henry went down to Ground Zero as part of the NYPD. He performed search and recovery on the pile, and also did traffic control in the area around the towers. He would comment on the horrendous conditions. He described the odor from all the fumes and the devastation of finding bodies in the rubble. He told me how his colleagues would have to go through therapy after finding bodies or body parts in the pile. It was certainly overwhelming for him and the other officers to be in that setting. Breathing became difficult for him. The governor's office said the air was clean, so they went without protection. Henry worked at the World Trade Center site every day for several months.

8. By the time he got sick, Henry had already retired and moved to Florida. He complained to me that his throat was bothering him and that he was having sinus issues. It continued to worsen so he sought medical treatment. He was diagnosed with GERD and sinusitis. After undergoing many MRIs and CT scans, Henry was diagnosed with esophageal cancer. He was devastated by the news, and, frankly, so was I. Especially since at first, he thought it was just a simple sore throat.

9. Henry struggled with esophageal cancer for three years. He couldn't walk, he couldn't swallow, and he was in pain the whole time. I remember how the cancer spread to his kidneys and made his whole body swollen. He was in so much pain, sometimes unbearable pain. He was a sick man who suffered a lot. He had all sorts of treatment: chemotherapy, radiation. But ultimately, treatment couldn't save him.

10. The esophageal cancer also impacted him emotionally. He fell into a deep depression. He wouldn't pick up calls from old friends or colleagues anymore. He was in denial and felt helpless. This was a young man who had just turned 51. He thought he had his whole life ahead of him. He never imagined something like this happening to him. At the hospital, they would ask him if they could do anything for him to make him comfortable. Every time, he'd say, "All I want to do is go home and have things go back to normal." That was devastating to hear and see. I tried to persuade him to stay alive, but he said, "I've suffered too

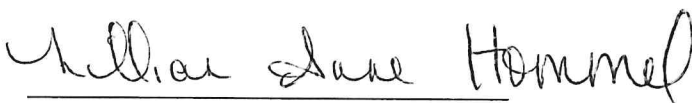


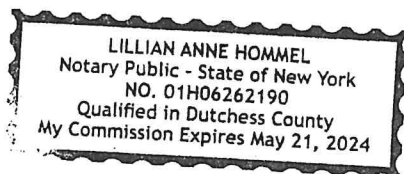
much. I'm going to go with God in heaven."

11. Everyone who knew Henry would say he was a sweetheart. He was passionate about helping others. That's why he became a police officer. He wore his NYPD uniform with honor and dignity. He carried himself with class. He knew how to reach people at all levels in life. He could connect with someone down in the dumps or high in society. He always made people feel comfortable, and he didn't look down on anyone. He never hurt or deceived people. He won an award from Ronald Reagan for an auxiliary police program that he organized with the NYPD. They even put his name in the magazines. But he didn't boast about it, he didn't even think much of it. I was so proud of him. He would simply say, "It's all in the line of duty." He was a real, beautiful person. He was outstanding. He was cut down much too soon in life. His death was an untimely and unexpected loss. A true loss. A great loss. A loss that never should have occurred.

  
SHEILA CRISS

Sworn to before me this  
21 day of June, 2022

  
Notary Public



## **Estate of Ronald Thomas Coyne**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
JUDITH COYNE**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF SUFFOLK )

JUDITH COYNE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 852 South Broadway, Lindenhurst NY 11757.
2. My current age is 56, having been born on April 15, 1965.
3. I am the wife of Ronald Thomas Coyne, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband died from respiratory disease on June 25, 2013, at the age of 45. His illness was determined by the World Trade Center Health to be causally connected to his exposure to the toxic air resulting from the 9/11 terrorist attacks.
5. On June 25, 2013, I was issued Letters of Administration of my husband's estate from the Surrogate's Court of Suffolk County in the State of New York.
6. Before Ronald's illness, we had a very active life. We were raising four kids at one time; our three biological children and my niece. He was very active with the kids; he supervised their youth group at church. Whenever he wasn't at work, he was always with me

and the kids.

7. My husband was an EMT for the New York City Fire Department, and he was supposed to have off from work on September 11, 2001, but he took someone else's shift. We always had a disaster plan prepared—it was to just stay where you are. And if that wasn't possible, the plan was that we would all meet at home. Ronald called me when he was on his way to the World Trade Center. He said, "Our plan is in place, everything is fine. I know you've heard things on the news, but I promise I'm going to be fine. I will contact you when I can. But I have to go and do my job." At 11:30 p.m., I got a call from the FDNY saying that Ronald was missing. I completely panicked. Then, at about 12:30 a.m., I got another call from the FDNY saying that he had been burned and that he could be in one of two hospitals. They wanted to send a shuttle to take me to the hospital, but I told them I couldn't go because I had four young children that I couldn't leave home alone. I was distraught. My oldest son came into my room that night and said, "Please don't lie to me, is my daddy gone?" I told him not to say anything to the other kids and that we would discuss it in the morning. At that point, I really didn't know anything. I finally fell asleep and woke up with the phone ringing in my hand. It was 6:00 a.m. on September 12<sup>th</sup>. It was Ronald calling from Kings County Hospital telling me that he was coming home.

8. My husband came home at 10:00 a.m. covered in ash and his uniform had caught fire. He collapsed at on the floor from exhaustion. I helped him into the bathroom to take a shower and had to pull pieces of concrete out of his scalp. He told me that he was helping people get out of a stairwell when the south tower started to fall. His uniform caught on fire and concrete was falling all around him. He ran out and broke the back window of a nearby SUV with his Mag-Lite and sheltered in there. The falling of the metal and concrete from the building actually flipped the SUV over, and he was trapped underneath. There was so much soot and ash he couldn't breathe. He lost track of his EMT partner but was able to escape. He continued to do his job until they sent him to the hospital. The nape of his neck was completely burnt, plus he had second degree burns on his back. It took about two weeks to get the concrete out of his skull.

9. After 9/11, Ronald was home for a year and a half. We were happy to have him physically, but he was a changed man mentally. He received a letter from the FDNY stating that what he ingested and inhaled on that day was a "toxic cocktail." I still have that letter. Most of



his illness was internal—he didn’t have any visible injuries. When he was home for those eighteen months, I was constantly taking him to doctor’s appointments. His respiratory issues became worse and worse. There was no such thing as vacation anymore. He was constantly in and out of the hospital.

10. Ronald would wake up screaming or crying many nights from the things that he saw. He would tell me all the things he saw, and I told him, “Don’t tell me that; I can’t handle it.” I urged him to see a therapist, which he did until the day he died. His therapist had to prescribe him sleeping medication. Ronald didn’t want to tell the FDNY he was still seeing a therapist because he didn’t want to lose his job. It’s also very difficult when you have children and something like this happens to you. Ronald felt like he wasn’t doing his job as a parent, because he didn’t have the energy that he used to have. He was just a shell of himself.


11. His respiratory capacity decreased immediately after 9/11. He had trouble breathing and had thrush constantly. I didn’t know how to help him cope with either the physical or mental symptoms. He developed Obstructive Sleep Apnea and had very heavy snoring. He had raised carbon monoxide levels in his blood, so we constantly had to rush him to the hospital because he was having trouble breathing. The respiratory symptoms were the scariest part. He couldn’t even stand up for too long.

12. Towards the end, Ronald also suffered from pancreatitis. On February 23, 2012, Ronald and I went out to a late Valentine’s Day dinner. He was a big steak eater, and that night he only wanted to eat the salad. He said he just wasn’t that hungry. So, we went home that night. The following day, my mother called me and said, “I know Ron is supposed to go back to work today, but he doesn’t look so good. He talked to me on the phone and sounds like he had cotton in his mouth.” I called him, and it sounded like he was slurring his words. I demanded that he come home, and he met me at home. He said his side hurt really badly, and the side of his body looked like it was swollen. When we got to the hospital, the doctor admitted him immediately for an enlarged pancreas. His triglycerides were over 1,000 (normal range is <100). They put him through a plasmapheresis treatment, which weakened his immune system. He got a *Clostridioides difficile* (*C. diff*) infection, and his breathing got so bad they put him on a ventilator. They put him in a medically induced coma for about a week. His kidneys were failing too, and they had to do dialysis. He was in the hospital from February 2012 to April 2012.

13. His pancreas still wasn't working properly; his body wasn't breaking down food. He had to go back to the hospital two weeks later. He couldn't stay awake. He was clearly suffering. Ronald's doctor told me he had a pancreas infection that had turned necrotic. The tail end of his pancreas was completely dead. After his death, Ronald's autopsy showed that his pancreas was completely necrotic. The autopsy report also showed colon polyps that could have been cancerous and acute bronchopneumonia.

  
JUDITH COYNE

Sworn to before me this  
31 day of March, 2022

  
Notary Public

ANTOINETTE SNYDER  
NOTARY PUBLIC OF NEW JERSEY  
Comm. # 500771  
My Commission Expires 2/15/2023

ANTOINETTE SNYDER  
NOTARY PUBLIC OF NEW JERSEY  
Comm. # 500771  
My Commission Expires 2/15/2023

ANTOINETTE SNYDER  
NOTARY PUBLIC OF NEW JERSEY  
Comm. # 500771  
My Commission Expires 2/15/2023

**Estate of Richard A. Dellacona**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF  
FORTUNATE SCHULZ**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NASSAU     )

FORTUNATE SCHULZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 895 Plum Tree Road West, Westbury NY 11590.

2. I am currently 72 years old, having been born on September 8, 1949.

3. I am the wife of Richard A. Dellacona, upon whose death my claim is based, and submit this this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. On September 3, 2012, my husband passed away from leiomyosarcoma at the age of 60. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On July 2, 2013, I was issued Letters Testamentary by the Nassau County Surrogate's Court.

6. Richard and I were like two peas in a pod. Both he and I were widowed prior to our marriage, so we were especially close because of that. Socially, we were very active. We vacationed together, lived together, we did everything together. Richard was the Chief of the Westbury Fire Department for over thirty years before he died. His full-time job was Assistant

Principal for Martin Van Buren High School. I was a nurse at Stony Brook University Hospital.

7. On 9/11, I learned of the Twin Towers coming down from someone in my workplace. I immediately called my husband, who was working in the school at the time. He called the Westbury Fire Department to let them know he was available to respond. The hospital mandated me to stay, because we were a Level I Trauma Center and were expecting to receive and treat survivors from the World Trade Center. I stayed at the hospital for three days straight, while Richard went down to Ground Zero with the fire department. I waited for hours at the hospital before slowly understanding that we weren't going to get any survivors. It was a terrible realization. No one knew how bad it would be. Even if Richard had known the outcome, he would've gone anyway. My husband came home and returned to Ground Zero intermittently for the next several weeks. Because he was the Chief of the department, he had to spend many days at the Command Post directing his team.

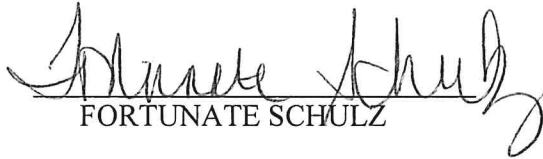
8. Richard was a healthy and extremely active man. He was rarely sick. In all the years that we were married, he had the flu only once. A year or two after 9/11, he started to have trouble with his legs. We were on vacation when all of a sudden, his legs gave out and I had to catch him. I was able to prevent him from falling, but I asked him, "What happened?" He said he didn't know; his legs just gave out. He had more falls after that and started to have back pain. His right leg used to give him issues, and we would call it the "bad leg." Our grandchildren knew that "Pop-Pop's right leg is the bad leg." At first, I thought maybe it was sciatica, but it got worse and worse. His leg was swollen, and he couldn't walk. He could barely fit his feet into shoes because they were so swollen. His stomach was also bloated.

9. The day before we were supposed to leave for vacation, Richard went to an orthopedic surgeon, who took an MRI. They strongly suggested that we get him to an oncology hospital immediately. I took him to North Shore Hospital. I almost passed out when I learned he had cancer. As soon as we got to the emergency room and were able to talk to a doctor, he started talking to me about quality of life. I remember thinking to myself, oh my God, he's going to die. I knew Richard was sick and was in a lot of trouble.

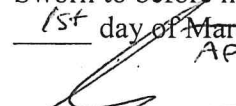
10. His pain soon became excruciating. His abdomen started to fill with fluid and became distended. They had to put him through surgery because the fluid was pressing on his diaphragm and gave him problems breathing. In the end, he couldn't even sleep on the bed, and


we had to put him in a recliner. He was so full of fluid and was in so much pain. One day, we were home when he started to scream in pain. The fire department was always on call, and they rushed him to the hospital. Once we got to the Emergency Department, there was nothing we could do. They immediately put him in palliative care. He was dead within six weeks of his diagnosis. It was surreal and devastating to me.

11. Richard was the kindest, gentlest, most giving person I have ever known. He was a strong, proud, intelligent man. When we got married, I had three grown children and he had two grown sons and grandchildren. But we never did the “mine and yours.” It was always “ours.” My grandchildren never knew their biological grandfather. But Richard was grandfather to all seven of my grandchildren. Richard’s legacy is the love he had for his family, biological and blended, and the love they had, and will always have, for him.

  
FORTUNATE SCHULZ

Sworn to before me this  
15<sup>th</sup> day of ~~March~~, 2022  
April

  
Notary Public

MATTHEW J. FLAHERTY  
Certified Notary State of New York  
County: Nassau  
Reg. #01FL6202072  
Exp: 3/09/20 

## **Estate of Charles Ferguson**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re: -----X

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF  
MARY FERGUSON

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF QUEENS     )

MARY FERGUSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 41-15 50<sup>th</sup> Avenue, Sunnyside NY 11104.
2. I am currently 70 years old, having been born on January 8, 1952.
3. I am the wife of Charles Ferguson, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from esophageal cancer on October 10, 2016. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On April 3, 2017, I was issued Letters Testamentary on behalf of Charles's estate by the Queens County Surrogate's Court.
6. Charles and I did everything together. We loved to travel and went to Europe and on several cruises. We had a full, active life. We went to concerts, to Carnegie Hall, loved the Mets and enjoyed going to baseball games during the season. We had a beautiful, wonderful life



together. Until Charlie got sick, we were busy doing something every weekend. Even when he got sick, we tried our best to go out. Right before he died, we were supposed to go on a cruise, which he was so looking forward to.

7. Charlie worked in building maintenance with Local 32B. He worked about three blocks from the World Trade Center. When the first plane hit the North Tower, Charlie went onto the roof of the building. He and his coworkers watched as the second plane struck the South Tower. He told me it was shocking. When the towers came down, he went out on the street and got caught in the cloud of dust. His building turned into a triage center for survivors, so he volunteered there for the next few days. He worked for several days straight on the clean-up effort. Charlie continued to work 40 hours per week or more at the same building until 2015.

8. In 2006, my husband started to have difficulty breathing. He was examined by doctors through the World Trade Center Health Program, who diagnosed him with gastro-esophageal reflux disease (GERD) and asthma. The asthma progressed to emphysema. He started off with inhalers, but later had to start using an oxygen tank. Soon he was on oxygen 24/7.

9. His respiratory symptoms were terrible. He was always short of breath, and as his illness progressed, he could barely breathe without the oxygen tank. Before 9/11, he was a strong and healthy man. He rarely had even a cold. Once his respiratory issues began, he was constantly getting sick and catching colds. Every day, he would wake up with a different ache or pain. He was very sick all the time. He developed sleep apnea and would wake up in the middle of the night gasping for air. There is nothing worse than witnessing someone who can't breathe. Charlie wasn't one to complain and didn't like to talk about how he felt. He didn't want me to worry, but I did worry because I could plainly see that he was in pain. He wasn't able to do anything anymore. He wanted to go on a cruise but was confined to a wheelchair the entire time.

10. As if not being able to breathe wasn't bad enough, Charlie was then diagnosed with esophageal cancer. They couldn't catch it early enough because his lungs were too weak to handle an endoscopy. He was diagnosed with Stage IV esophageal cancer and given a prognosis of 3 to 6 months to live. Even with chemotherapy, they said, his prognosis would be only a year or so. When they told me, I just broke down and cried. It was positively dreadful. After learning

he had cancer, Charlie just went to bed. He started sleeping all the time. He knew he was already dying from the emphysema, but the cancer diagnosis caused a big change in his emotions. He became depressed and withdrawn. We used to collect coins together, and I would bring my change home and go through it with him to look for new coins. He said, "Mary, don't bother bringing the coins home anymore." His weight dropped dramatically from the cancer. His legs were like sticks. He needed help to do everything, even showering. It was so devastatingly sad.

11. After Charlie stopped working in 2015, we had to rely on his disability income. Financially, we were in much worse shape than when he was working. We had to hire an aide to help him towards the end of his illness. Charlie used to do all the bills, and I had to get help with that when his illness progressed. I hired a money manager at one point because I just didn't know what to do. Everything became so much harder once he passed.

12. Charlie was a great guy. He was very popular and well-liked, funny, and he had a lot of friends. When he died, I was left having to handle a lot of things. He used to cook for me, and help with stuff around the house, but now I have to do that all on my own. He'd help me clean and walked our dog. Now, I'm left to do it all alone. I still miss him terribly, even five and a half years later. I watch something on TV and think, "Oh, Charlie would love this." We did so many great things together. Every time I see an advertisement for a cruise, I get emotional. He was an amazing man. I'll always cherish the wonderful times we had together and truly miss the ones we'll never have again.

  
MARY FERGUSON

Sworn to before me this  
\_\_\_\_\_ day of April, 2022

APR 21 2022

\_\_\_\_\_  
Notary Public

STATE OF NEW YORK  
CITY OF NEW YORK  
COUNTY OF QUEENS  
NOTARY PUBLIC:  
SEAL:

  
SHERBAN M. STANDISH  
Commissioner of Deeds  
City of New York No. 4-4325  
Certificate Filed in Queens County  
Commission Expires Feb. 1, 2027